

Message

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Sent: 4/29/2019 3:42:29 PM
Subject: lowerline draft action memo.docx
Attachments: lowerline draft action memo.docx

With regard to whether Radium-226 is a hazardous substance versus a pollutant or contaminant: Part 302.4 includes Radionuclides and then in Appendix B, the radionuclides are listed with specific RQs, etc.

Radium-226 is a radionuclide and a hazardous substance according to section 101(14) of CERCLA, 42 U.S.C. § 9601(14) and 40 C.F.R. § 302.4, specifically Appendix B. *See* Attachment 2, Material Safety Data Sheet for Radium.

Legal Information Institute (LII)

Electronic Code of Federal Regulations (e-CFR) - Title 40, Protection of Environment - Chapter I, ENVIRONMENTAL PROTECTION AGENCY - Subchapter A, SUPERFUND, EMERGENCY RESPONSE, AND COMMUNITY RIGHT-TO-KNOW PROGRAMS - Part 302, DESIGNATION, REPORTABLE QUANTITIES, AND NOTIFICATION - Section 302.4, Designation of hazardous substances.

Protactinium-228	51	16 (3.7E 11)
Protactinium-230	51	16 (3.7E 11)
Protactinium-231	51	0.01 (3.7E 8)
Protactinium-232	51	16 (3.7E 11)
Protactinium-233	51	160 (3.7E 12)
Protactinium-234	51	16 (3.7E 11)
Radium-223	58	1 (3.7E 10)
Radium-224	88	16 (3.7E 11)
Radium-226	58	1 (3.7E 10)
Radium-228	88	1600 (3.7E 13)
Radium-229	58	0.1 (3.7E 9)
Radium-230	88	0.1 (3.7E 9)
Radium-232	88	0.1 (3.7E 9)
Rhenium-127	75	1600 (3.7E 13)
Rhenium-185	75	1600 (3.7E 13)
Rhenium-186	75	160 (3.7E 12)
Rhenium-187 (12.7 hr)	75	16 (3.7E 11)
Rhenium-187 (4.0 hr)	75	16 (3.7E 11)
Rhenium-188	75	16 (3.7E 11)
Rhenium-189	75	16 (3.7E 11)